

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 687

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIRST OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) DUPLICATE CLAIMS,
(II) INSUFFICIENT DOCUMENTATION CLAIMS, (III) INCORRECT DEBTOR
CLAIMS AND (IV) LATE-FILED CLAIMS**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On November 10, 2023, the Debtors filed the *Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims* [Docket No. 687] (the “**Claim Objection**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Claim Objection was, among other things, a proposed form of order approving the relief requested in the Claim Objection (the “**Proposed Order**”).

2. Pursuant to the notice filed with the Claim Objection, any objection or response to the relief requested in the Claim Objection was to be filed and served so as to be received no later than **November 27, 2023 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

3. Prior to the Objection Deadline, the Debtors received informal responses (the “**Informal Responses**”) from the following claimants: (i) The Timpken Company and the Timken

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Corporation (“**Timken**”); (ii) Fiberdyne Research Pty. Ltd. (“**Fiberdyne**”); and (iii) John Chou and Yajane Chu, JT (“**Chu**”). Other than the Informal Responses, the Debtors received no other responses to the Claim Objection and no objections or responses were filed on the Docket.

4. Attached hereto as **Exhibit A** is a revised proposed order (the “**Revised Order**”) which resolves the Informal Responses. With respect to Fiberdyne, the Debtors and Fiberdyne have agreed to adjourn the hearing on the Fiberdyne Claim Objection until the Debtors January omnibus hearing date. The Informal Responses of Timken and Chu were resolved through revisions to the Revised Order. For the convenience of the Court and all parties in interest, a blackline of the Revised Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the proposed form of order granting the relief requested in the Claim Objection, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: December 5, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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